

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA

PATRICK MICHAEL FALCEY, JR.,	:	CIVIL ACTION
	:	NO. _____
Plaintiff,	:	
V.	:	
BUCKS COUNTY, PENNSYLVANIA;	:	
BUCKS COUNTY CORRECTIONAL FACILITY;	:	
PRIMECARE MEDICAL, INC.;	:	
MEDICAL SERVICES, BUCKS COUNTY	:	
PRISON;	:	
CARL METTELLUS, WARDEN, BUCKS	:	
COUNTY PRISON;	:	
DAVID KRATZ, DIRECTOR, BUCKS COUNTY	:	
PRISON;	:	
ROBERT HARVIE, JR., CHAIRMAN, BUCKS	:	
COUNTY PRISON OVERSIGHT BOARD;	:	
CHRISTOPHER NORFLEET, HEALTH	:	
SERVICE	:	
ADMINISTRATOR, PRIMECARE MEDICAL,	:	
INC.;	:	
LEE ANN REYNOLDS, REGISTERED NURSE,	:	
PRIMECARE MEDICAL, INC.;	:	
INNA PANASENKO, REGISTERED NURSE,	:	
PRIMECARE MEDICAL, INC.;	:	
PAULA ERISMAN, REGISTERED NURSE,	:	
PRIMECARE MEDICAL, INC.;	:	
KRISTIN HILL, ASSISTANT HEALTH	:	
SERVICE ADMINISTRATOR, PRIMECARE	:	
MEDICAL, INC.;	:	
JOHN/JANE DOE, MEDICAL	:	
SERVICES, BUCKS COUNTY PRISON;	:	
Each Defendant is sued in his/her individual	:	
capacity;	:	
Defendants.	:	

I. JURISDICTION AND VENUE

1.) This is a civil action authorized by 42 U.S.C. Section 1983 to redress the deprivation, under color of state law, of rights secured by the Constitution of the United States. The Court has jurisdiction under 28 U.S.C. Section 1331 and 1343 (a)(3). Plaintiff seeks declaratory relief pursuant to 28 U.S.C. Section 2201 and 2202. Plaintiff's claims for injunctive relief are authorized by 28 U.S.C. Section 2283 & 2284 and Rule 65 of the Federal Rules of Civil Procedure.

II. PLAINTIFF

2.) Plaintiff Patrick Michael Falcey, Jr., a United States Citizen, Amiable Individual, and Volunteer Good Samaritan in the Community was at all times mentioned herein a prisoner of the County of Bucks, Pennsylvania in the custody of the Bucks County Department of Corrections. He is currently confined in the State Correctional Institution at Chester for all misdemeanor offenses that resulted in not even the slightest injury or risk of injury to any human life.

III. DEFENDANTS

3.) Defendant Carl Mettellus is the Warden of the Bucks County Correctional Facility (BCCF) (also known as the Bucks County Prison) located at 1730 South Easton Road in Doylestown, Pennsylvania. He is legally responsible for the operation of the BCCF and for the welfare of all the inmates of that prison.

4.) Defendant David Kratz is the Director of the Bucks County Department of Corrections at the BCCF in Doylestown, Pa.

5.) Defendant Robert Harvie, Jr. is the Chairman of the Bucks County Prison Oversight Board. His office is located at 55 East Court Street in Doylestown, Pa.

6.) Defendant Christopher Norfleet is the Health Service Administrator of PrimeCare Medical, Inc. and Medical Services at the BCCF in Doylestown, Pa.

7.) Defendant Lee Ann Reynolds is a Registered Nurse of PrimeCare Medical, Inc. and Medical Services at the BCCF in Doylestown, Pa.

8.) Defendant Inna Panasenko is a Registered Nurse of PrimeCare Medical, Inc. and Medical Services at the BCCF in Doylestown, Pa.

9.) Defendant Paula Erisman is a Registered Nurse of PrimeCare Medical, Inc. and Medical Services at the BCCF in Doylestown, Pa.

10.) Defendant Kristin Hill is an Assistant Health Service Administrator of PrimeCare Medical, Inc. and Medical Services at the BCCF in Doylestown, Pa.

11.) Defendant Bucks County is a political subdivision in Pennsylvania.

12.) Defendant PrimeCare Medical, Inc. and Medical Services provides medical care at the BCCF.

13.) Defendant Bucks County Correctional Facility (BCCF) is a county prison that is operated by the county of Bucks in Doylestown, Pennsylvania.

14.) Defendant John/Jane Doe is a medical staff member who knowingly refused to respond to Plaintiff's medical emergency on June 26, 2022 at the BCCF. His or her true name is currently unknown.

15.) Each Defendant is sued in their individual capacity. At all times mentioned in this complaint, each defendant acted under the color of state law. (Plaintiff may seek to sue in ones official capacity and injunctive relief due to him potentially returning to the BCCF on writ in the future.)

IV.FACTS

16.) Plaintiff Patrick Michael Falcey, Jr. has a past medical record history of seizures (attached hereto as Exhibit A & A1), chronic pain from past trauma to neck, back, and head (Exhibit B), and mental health diagnosis of Bipolar disorder, Depression, etc.(Exhibit C).

17.) On June 26, 2022 at approximately (approx.) 0500 hours, Mr. Falcey began having seizures and convulsions at the Bucks County Correctional Facility (BCCF) in housing unit #20 cell on E-module.

18.) Mr. Falcey declared medical emergency yelling his state of condition while on the ground in and out of awareness by the cell door to all staff present on the unit, Correctional Officer (C/O) Hardiman and C/O Bombay to which they replied: "hang on Falcey, hang in there bud, we're calling, we've been calling, they're on the way, they should be here soon" over the course of several hours.

19.) By approx. 0900 hours (still without any medical aid arriving), a Case Manager (upon information and belief to be Mr. Brookins) made the gross error in deciding to have Mr. Falcey (while still in the same state of condition of having convulsions and seizures) moved to another cell on the top tier-24 cell on the same module-E because Mr. Falcey's housing unit (E-20) apparently was needed for another housing matter.

20.) Mr. Falcey then called for inmate Nathan Phillips BCP#111824 and inmate Gary Morgal BCP#037454 as witness to the events, as well as C/O Hardiman as he continuously called medical staff but still never arriving.

21.) They then helped Mr. Falcey up the stairs and brought his property up to him as he layed in housing unit #23 cell (E-23) because he could not make it to the top bunk of E-24 cell as apparantly ordered from a Case Manager from reception all while Mr. Falcey still remained in a convulsing state.

22.) By that time (with Mr. Falcey not making it to lunch), and still in the vacant cell of E-23, Mr. Falcey finally became unresponsive after:

(a.) falling/dropping foward and backwards from having dozens of seizures and convulsions, exacerbating his previous back and neck trauma (nerve damage that causes pain, ongoing chronic sharp pains);

(b.) badly biting tongue, which damaged his taste buds resulting in him not being able to taste his food and his speech being slurred from a permanent numbness in parts of his tongue that continued bleeding for nearly three (3) days after the June 26, 2022 incident.

23.) Mr. Falcey then rose at approx. 1700-1800 hours and "hobbled" off of the unit directly to Shift Command and he approached Sergeant O'donnell and advised him of the matter, he then told Mr. Falcey to "take his time" and head straight into the Medical Dept.

24.) Once Mr. Falcey arrived to Medical at approx. 1800 hours, the present nurse ("RN Becca") whom was entering a report (whom at least appeared to be from Mr. Falcey's perspective) on all the events he stated to her exactly as described within all the above facts, and her response was:

"I cant believe no one from Medical came to you in all that span of time".

(12 plus hours-from approx. 6:00a.m. to 6:00p.m.)

25.) Mr. Falcey was then placed on a medical watch status with high doses of Motrin/Advil for 72 hours

26.) The witnesses to these events which are stated within this complaint: C/O Hardiman, C/O Bombay, Sgt. O'donnell, Inmate (I/M) Nathan Phillips BCP#111824, and Gary Morgal BCP#037454 are/should be within the initial responding Nurse's report as well (June 26, 2022 at approx. 1800 hours), and approx. three (3) days, or within 3 days after being on the medical watch status, Mr. Falcey was called down to the Medical Dept. to again submit a report of the same, this report was taken by "PA Molly".

27.) In the midst of the approx. 12 hour period in which Plaintiff Mr. Falcey received no medical aid to his condition of urgency, by a conscious and subjective disregard, and deliberately indifferent acts and omission of bad faith, Plaintiff suffered:

- (a.) badly bitten tongue;
- (b.) lower and middle back badly bruised and injured, highest levels of pain, can hardly (sometimes unable to) sit up, stand up, and turn either way when horizontal/laying down;

28.) It was well known to Defendant John/Jane Doe and Medical Staff that Mr. Falcey had a serious medical need, one that was so obvious that even a lay person would easily recognize the necessity for a doctor's attention. Staff failed to take any action to aid Mr. Falcey despite the obvious need for medical attention, which would have prevented further physical pain and injury to Mr. Falcey.

29.) An appointment created June 1, 2022 (22 days prior to initial incident) describing: "recs here regarding seizure disorder from St. Mary's (Hospital)... med? ccc? not back 6/2, 6/7" reveals Medical Staff's prior knowledge of Plaintiff's sufficiently and objectively serious chronic medical need (Exhibit D).

30.) Plaintiff requested medical attention through Sick Call Requests and Inmate Request Forms inquiring medical attention, many of which went unanswered, one in particular where Plaintiff advised of being in a poor state of condition 3 days prior to Plaintiff having seizures and suffering said injuries was answered (Exhibit E).

31.) Mr. Falcey's prison medical charts/records have been falsified due to:

- (a.) Plaintiff receiving incomplete medical records after he received said requested records from Defendant PrimeCare Medical, Inc.
- (b.) deliberately indifferent acts of retaliation by Defendant Lee Ann Reynolds denying Mr. Falcey (while he was in unbearable pain) his pain medication on July 20, 2022, on July 21, 2022 (witness statements attached as Exhibit F, G, & H), then 8 days later on July 27, 2022 while Mr. Falcey was receiving his Medicated Assisted Treatment (MAT-Buprenorphine), this same nurse Defendant Lee Ann Reynolds falsely accused (and falsely entered into Mr. Falcey's medical record chart) that he "was diverting his medication", when Mr. Falcey did not "divert" his medication, let alone was he ever found guilty of any institutional misconduct for "diverting" medication (administrative remedy of this matter also was fully exhausted-Exhibit I, I1, I2, & I3). (Exhibit J, J1, & J2 attached reveals the Sick Calls Mr. Falcey submitted regarding continued high levels of unbearable pain from his initial June 26, 2022 injuries, and his extreme uneasiness from MAT medication being cut in half (within a one day period) from 16mg to 8mg

due to biased and false accusations by retaliation.

(c.) Mr. Falcey had been sleeping with cotton balls in his mouth for weeks after the initial incident of having seizures and convulsions so he would not bite his tongue in his sleep, and, on July 4, 2022 at approx. 0500 hours when Mr. Falcey was awoken while still in a poor state of condition to be given his MAT, Defendant Inna Panasenko also falsely accused (and falsely entered into Mr. Falcey's medical record chart) that he "was diverting his medication", when Mr. Falcey did not "divert" his medication, let alone was he ever found guilty of any institutional misconduct for "diverting" medication (Exhibit K).

32.) By yet another deliberately indifferent act with illegal intent of retaliation, on August 23, 2022, Defendant Kristin Hill, for no apparent or rational reason other than for a biasing retaliation did she have Mr. Falcey placed in a segregated lock medical watch status for 8 days, including committing theft by having approx. \$40.00 taken from Mr. Falcey's inmate account for Sick Call Requests that he was never even seen for (Exhibit L, L1, L2, L3, L4, L5, & L6). Also fully exhausted.

33.) Since the initial injury sustaining June 26, 2022 incident while Mr. Falcey was still incarcerated for 5 months at the Bucks County Correctional Facility, he has lived in subversive fear of said Staff and Defendants invidiously and maliciously seeking/waiting for another/the next opportunity to retaliate against Mr. Falcey in some way/deliberately leave/let him suffer further injuries from any future seizure activity, including the fact that many other inmates have been left to die and suffer substantial and unjustifiable injuries by being deliberately ignored by BCCF Medical Staff because Staff falsely assumes that inmates are "lying/pretending" when in fact, they are not.

34.) Mr. Falcey has lived in extreme paranoia and has been distrustful of most staff at the BCCF, as he also continued to have reoccurring nightmares of falling in and out of consciousness while stuck in a convulsing state with Correctional Staff and Medical Staff laughing at him. Mr. Falcey met with the Mental Health Department at least 3 or more times a month after the initial incident (See Exhibit M).

V. EXHAUSTION OF LEGAL REMEDIES

35.) Plaintiff Patrick Michael Falcey, Jr. utilized the prison grievance system/procedure available at the Bucks County Correctional Facility by presenting the facts related to his complaint on July 7, 2022. On August 10, 2022, Mr. Falcey was sent a false and deflecting response, including that the grievance had been denied. He then appealed to the Director (Defendant David Kratz) to then receive the same results for a second level response on October 11, 2022. He then appealed the Director's response to the final level of administrative remedy (by U.S. Certified Mail to Defendant Robert Harvie, Jr.) at the Bucks County Prison Oversight Board with no response to date-Exhibit N, N1, N2, O, O1, O2, O3, O4, & O5).

IV. LEGAL CLAIMS

36.) Plaintiff realleges and incorporates by reference Paragraphs 1 through 35 as if fully set forth herein.

37.) The deliberate indifference to Plaintiff's serious medical needs violated Plaintiff's rights and constituted cruel and unusual punishment under the Eighth and/or Fourteenth Amendments to the United States Constitution.

38.) By virtue of their office and authority, Defendants Bucks County, Pennsylvania, Bucks County Correctional Facility, Carl Mettellus, David Kratz, Robert Harvie, Jr., and Medical Services have the power to ensure that medical and prison staff are not deliberately indifferent to Plaintiff's serious medical needs.

39.) Defendants Bucks County, Pennsylvania, Bucks County Correctional Facility, Carl Mettellus, David Kratz, Robert Harvie, Jr., and Medical Services have failed to prevent the deliberate indifference to Plaintiff's serious medical needs by prison staff and medical personnel by not assuring that Defendant John/Jane Doe, PrimeCare Medical, Inc., Medical Services, and accompanying staff would not have intentionally refused to provide adequate medical care to Plaintiff's condition of urgency despite their knowledge of the need for that care, all by which invoked reckless and/or callous indifference to Plaintiff's federally protected rights under the Eighth Amendment's prohibition of cruel and unusual punishments.

40.) Defendant Bucks County, Medical Services, and PrimeCare Medical, Inc. was/is guilty of a pattern of abuse by deliberately indifferent acts of retaliation, as they had a policy that they themselves by deliberately indifferent acts and omissions of bad faith did not follow, causing the violation of Plaintiff's rights and constituting cruel and unusual punishment under the Eighth and/or Fourteenth Amendment to the United States Constitution.

41.) Defendant Christopher Norfleet, Lee Ann Reynolds, Inna Panasenko, and Kristin Hill's deliberately indifferent acts and omissions of bad faith and ongoing chains/patterns of retaliation caused physical and psychological harm, and affliction to the Plaintiff and violated Plaintiff's rights, which constituted cruel and unusual punishment under the Eighth Amendment of the United States Constitution.

42.) The Plaintiff has no plain, adequate, or complete remedy at law to redress the wrongs described herein. Plaintiff has been and will continue to be irreparably injured by the conduct of the Defendants unless this Court grants the declaratory relief which Plaintiff seeks.

V. PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully prays that this Honorable Court enter judgment granting Plaintiff:

43.) A declaration that the acts and omissions described herein violated Plaintiff's rights under the Constitution and laws of the United States.

44.) A preliminary and permanent injunction (if the Plaintiff returns on writ to the Bucks County Correctional Facility in the future and this Court deems him eligible if such an event should occur) ordering Defendants Bucks County Correctional Facility, PrimeCare Medical, Inc., and Medical Services to provide adequate and constitutionally required medical care to a condition of urgency that is necessary for a doctor's need, and to not commit any further ongoing patterns/chains of retaliation.

45.) Compensatory damages in the amount of \$75,000.00 against each Defendant, jointly and severally.

46.) Punitive damages in the amount of \$90,000.00 against each Defendant.

47.) A jury trial on all issues triable by jury.

48.) Plaintiff's costs in this suit, including signed apology letters addressed to the Plaintiff by each Defendant.

49.) Any additional relief this Court deems just, proper, and equitable.

Thank You for Your Service in the field of Justice.

Dated: June 20, 2024
Respectfully Submitted,

Patrick Michael Falcey, Jr.
#QP3084, SCI-Chester
500 East Fourth Street.
Chester, PA 19013

VERIFICATION

I have read the foregoing complaint and hereby verify that the matters alleged therein are true, except as to matters alleged on information and belief, and, as to those, I believe them to be true.

I certify under penalty of perjury that the foregoing is true and correct.

Executed at Chester, Pennsylvania on June 20, 2024.


Patrick Michael Falcey, Jr.



Medic M003700487
DATE/TIME OF FALCEY, PATRICK M 02/22/2012 M 20Y 05/24/1991
CONSULT MUELLER, JOHN J DO LP0314481771
CONSULT AND FALCEY, PATRICK M
CONSULT AND ORDER

* Exhibit A

Falcey, Patrick

Cardiac arr
EKG

CONSULTING PHYSICIAN OR SERVICE: Bradley

REASON FOR CONSULTATION: Severe

CONSULTANTS REPORT:

Severe noted x2 this AM.
Some recreation last night.
Postural, fairly profound.
@ night. @ contactivity (still)
as a head. (resembles -
resembles -
PM b/t
Severe (ETCA related) (8/20/0)
Lyme x2, last 2004 (spells)
@ am throug IV
Med
P.

Exam: 11/9/04 (132), 94% RA 2/18

egs: 110/3, chest 18, 9

(2) Emol slapping

F & R Delirious

Labs: 129/102/16/136 AST 22
\$8.14/11.2 ALT 23
A/G 1.2 5/14/24 UDS: Cytokeratins
11.5 (1.0 9.5 14.6
29 (4.0 240 N 8.25 L 18.1

APP: Lyme serology
Starf Electracard
Repet MPV +/-
Repet ECG
WBC Precautious

Signature of Consult

PM:

Other head: not done

2/22/12 AM
Date Hour
PM

Med head (8/19/10): E.

Bed (8/19/2010): E.
8/20/10: E.

Message taken by _____

Entered in computer by _____



Langhorne-Norwichtown Road, Langhorne, PA 19047
History & Physical

was taking "synthetic cocaine"

Chief Complaint *over grandpa - had convulsions*
History of Present Illness *of Shaking and cramps*
pull up - (was on grandpa when this happened) - when grandpa saw him - was stiff as a board

Past Medical History *P. Dorothy - pt was seizure*

CAD MI Herniated Disc/DDD *when 18*
 Angina Neurologic or Neuro deficits *now awake*
 PTCA/Cardiac Catheterization TIA/Stroke *now awake*
 HTN Seizures *2 yrs ago after VP*
 Arrhythmias Migraines
 Valvular Heart Disease/mutur Hepatitis
 CHF Hiatal Hernia/Reflux/GERD/PUD
 Hyperlipidemia HIV/AIDS
 Renal Disease Cancer
 PVD Anemia/Bleeding Disorder
 Obesity Pregnant Yes No
 DM Possibility of Pregnancy Yes No
 Thyroid Disease LMP _____
 Asthma/Emphysema Hearing/Vision Loss
 Arthritis - Type Other
when in school - was in special ed - ADD

Pediatric Patients only:

Birth History:

(always in special classes & mainstream)

Hospitalizations:

Immunizations: Up to date

Review of Systems

Chest Pain Edema Headache Dysuria Diarrhea/constipation
 Palpitations Wheezing Dizziness Nocturia Melena/rectal bleeding
 SOB Cough/URI/Flu Paresthesia Abdominal Pain Heartburn
 DOE/PND Nasal Congestion (arms/hands/legs/feet) Nausea/vomiting Anorexia
 Fatigue Sore Throat Urinary frequency Fever/chills/sweats Weight loss/gain
 Other *has rectrix up people office tomorrow*

PHYSICAL EXAMINATION *at his home*

General Appearance: *Answers questions - awake alert appears responsive*

Skin: *dry & breakdown*

Head: Normocephalic Head circumference <3 yrs

Eyes: PERRLA EOMI Sclera
45 mm apart & nystagmus

Ears: Tympanic Membranes: Intact No inflammation

Throat: No erythema No exudate

Neck: Supple/No masses No thyromegaly JVD _____ cm
 Carotids bruits none L R
 Mass

Breast/Axilla: Mass Refraction Nipple discharge
 Nipple Inversion Not examined

Lungs: Lungs, clear to auscultation and percussion Regular, even, nonlabored

resin core smoking 500 & taking cough medo

016647 REV. 7/03

M003700487

FALCEY, PATRICK M
02/22/2012 20Y M 05/24/1991
BRADLEY, CHRISTOPHER C MD PHD
LP0314481771 (9)

Allergies/Type of Reaction:

NKA

Meds/Vits/Herbs:

Q

father - STTH/loss

Social History:

Tobacco *1/2 pack*

Alcohol *occasional*

Other *used "both salts" - no decaff, but still Cheesecake*

Family History: *g - pop DM*

Family History Problem with Anesthesia: (If Applicable)

No Yes, Explain

Past Surgical History *prior use ECT, post ETOH 23 AM*

3/4/14 11/15 T30 anion gap 23

PT 11.5 PTT 29 INR 1.0

9.9/14.6 2/40 & shift

(Procedure, anesthesia, complications) *CT pending*

139/102, 14

3/4/14 11/15 T30 anion gap 23

PT 11.5 PTT 29 INR 1.0

9.9/14.6 2/40 & shift

CT - opiates - pas

Health: *stable*

RR with S1 S2 No M/R/G Irregularly, irregular Murmur/rub/gallop ectopy

Genitalia/Rectum: *decreased vaginal barrel problems*

Abdomen: Soft, non-tender, non-displaced Bowel sounds + No palpable masses No hepatosplenomegaly

Musculoskeletal:

Full ROM Limited ROM
 No Joint Deformities DJD Limp

Extremities: No CCE Edema Pulse

Neurological: AAO x3 Cervical-XII grossly intact Gait Steady
 Speech clear & coherent Pediatric only development status

Impression: *Seizure*

Plan:

Signature: *Francine Miller* Date: *2/22/12*

Attending Physician: _____

22 12:14:32 PM -0400 FAXCOM

PAGE 1 OF 1
User: PVBZ4748 6/6/2022 12:09:42 PM

15233912

Exhibit B

St. Mary Medical Center
 1201 Langhorne-Newtown Road, Langhorne, PA19047
 215-710-2185
 Diagnostic Imaging

PATIENT NAME: FALCEY, PATRICK M
 MED REC NO: M003700487
 ACCT NO.: LP0343233912
 ORDER NO: 0414-0126

DOB: 05/24/1991 AGE: 30 SEX: M
 PT CLASS: REG ER ACCESSION#: 7767196.001
 PT ROOM/BED: LOC: MLER
 DEPT: CT Scan

ORDERING DR(S): SKORODINSKY, LEV PA-C
 ATTENDING DR.:
 PROVIDER NOT ON FILE NAME:
 PROVIDER NOT ON FILE PHONE:
 CC: GLASSMAN, GARY MD; NONE, DOCTOR MD; SKORODINSKY, LEV PA-C

REASON FOR EXAM: Unresponsive

COMMENTS:

ADMITTING REASON: EMS-LEVEL 2 TRAUMA

PREGNANT: N

SERVICE DATE/TIME: 04/14/22 1439
 REPORT DATE/TIME: 04/14/22 1536

PROCEDURE: CT Brain WO
 REPORT NO.: 0414-0454

Status: Signed

Noncontrast CT scan of the head and cervical spine

Indication: Trauma, head and neck pain

Comparison: 2/23/2012

Technique: Noncontrast CT scan of the head was obtained from the vertex through the foramen magnum. Noncontrast CT of the cervical spine was performed with sagittal and coronal images reformatted. Automated exposure control was utilized.

Findings: There is no evidence of acute intracranial hemorrhage, abnormal brain parenchymal density, mass or mass effect, extra-axial collection or hydrocephalus. Soft tissues of the scalp are normal. The visualized paranasal sinuses and mastoid air cells are clear. Ossous structures are normal.

The sagittal alignment is maintained. There is no evidence of acute fracture, listhesis or osseous destruction. There is no prevertebral soft tissue swelling. The paraspinal soft tissues are unremarkable. The cervical airway is patent. The lung apices are clear.

Impression:

No acute intracranial abnormality.

No evidence of cervical spine fracture or listhesis.

Electronically signed by: Jeffrey Steinig MD 04/14/2022 03:33 PM EDT Workstation: RAIWRS2457D

TECHNOLOGIST: DAM
 READING DOCTOR: STEINIG, JEFFREY D MD

PAGE: 1 OF 2
 PATIENT NAME: FALCEY, PATRICK M
 MR#: M003700487
 REPORT#: 0414-0454

Exhibit C

Emergency and Court Quick View

Name: FALCEY, PATRICK MICHA
 Alias:
 SSN: 591-13-2091

Client ID: 600105

DOB: 5/24/1991

UnresolvedMergeNote:

Last known phone: 215-860-2861

Last known address: 5 WINTERSET COURT

NEWTOWN

PENNSYLVANIA

18940

Has client had a claim SINCE 7/1/17: Yes Date of last claim IN AVATAR: 3/4/2020 Claims on or after 7/1/2017
Claims prior to 7/1/2017

Does client have any member level authorizations? No Service Authorizations

Does client have forensic chart? No Has client's charge been purged prior to 2000: No

Does client have Other Issues/Comments? No Comments

Episode History

Program: Mental Health

Effective Date: 6/14/2019

Lapse Date:

LIST OF ALL DIAGNOSES USED (in claims since 7/1/17) and no more than last 3 years

<u>Code</u>	<u>Diagnosis Description</u>	<u>First Claim Date</u>	<u>Last Claim Date</u>
F31.32	Bipolar disorder, current episode depressed, moderate	06/14/2019	03/04/2020

Emergency and Court Records

<u>Type</u>	<u>Date</u>	<u>Delegate</u>	<u>Facility</u>	<u>Discharge</u>
302	8/19/2010	TONY SEVICK	ZZE_SAINT MARY'S HOSPITAL	<u>Petition</u>
APPROVED (DELEGATE, 2 DR, POL)				
303	8/23/2010			NO
				<u>Hearing</u>

Received
 (initials) 6/21/2024



Appointment Change Note	Sick call completed 6-8-22 at 9:44 am by Victoria Weikel, MHC
Change Note Type	Completed Appointments
Change Note Date	06-08-2022 12:00 am
Change Note By	Rose, MHC (BH), Victoria

Appointment Scheduled Date	06-08-2022
Appointment Created Date	06-01-2022 9:58 am
Appointment Description	MAT Evaluation complete EKG
Appointment Category	EKG
Priority (1=High, 5=Low)	1
Current Status	Rescheduled
Requested by Patient?	No
Appointment Set By	Harvey, CRNP, Katie
Appointment Last Modified By	Norfleet, RN, Christopher
Last Modified Date and Time	06-10-2022 6:57 am
Appointment Completed By	N/A
Completed Date and Time	N/A
Appointment Change Note	Rescheduled Appointment
Change Note Type	Rescheduled Appointments
Change Note Date	06-10-2022 12:00 am
Change Note By	Norfleet, RN, Christopher

* Exhibit D

Appointment Scheduled Date	06-08-2022
Appointment Created Date	06-01-2022 11:10 am
Appointment Description	recs here regarding seizure d/o from St Mary's.. meds? Need ccc? not back 6/2, 6/7
Appointment Category	NP/PA
Priority (1=High, 5=Low)	2
Current Status	Completed
Requested by Patient?	No
Appointment Set By	Harvey, CRNP, Katie
Appointment Last Modified By	Diaz, PA-C, Christopher
Last Modified Date and Time	06-08-2022 10:30 am
Appointment Completed By	Diaz, PA-C, Christopher
Completed Date and Time	06-08-2022 10:30 am
Appointment Change Note	to discuss with PA
Change Note Type	Completed Appointments
Change Note Date	06-08-2022 12:00 am
Change Note By	Diaz, PA-C, Christopher

Appointment Scheduled Date	06-08-2022
Appointment Created Date	05-31-2022 11:59 am
Appointment Description	Segregation Rounds
Appointment Category	Segregation Rounds
Priority (1=High, 5=Low)	2
Current Status	Deleted
Requested by Patient?	No
Appointment Set By	Mathews, LPN, Misty
Appointment Last Modified By	Tamburino, RN/ADON, Lauren

Exhibit EPrimeCare Medical, Inc.— SICK CALL REQUEST / PETICIÓN DE ENFERMERIA —

NAME / NOMBRE Patrick Falcey, Jr. DATE / FECHA 6/23/22
 PATIENT NUMBER / NÚMERO DE IDENTIFICACIÓN DEL PACIENTE 105188
 DATE OF BIRTH / FECHA DE NACIMIENTO 05/29/1991
 (UNIT / CELL) / (UNIDAD / CELULA) F-20-D5

(TO BE COMPLETED BY PATIENT) / (PARA SER COMPLETADA POR PACIENTE)

REASON FOR REQUEST / RAZÓN DE LA SOLICITUD To - N.S. Gessner

Medical Staff, Good morning/afternoon,
 I firstly apologize for the continuous
 correspondence as I am enduring EXTREME
headache here at the PCT. Please just
 respond and attend when able. Thank you for
 your service in the medical field!

(TO BE COMPLETED BY MEDICAL STAFF)

Respectfully, 6/24/22 (PARICEE SR)

DATE RECEIVED IN MEDICAL:

RESPONSE:

Here in the medical department
we respectfully & graciously accept
your apology.

W. J. Falcey
 (SIGNATURE)

6/24/22
 (DATE)

e-File AllForm # 9113 AU
PCM Forms Manual © 2016

Pg. 4

2022-64 pg 4

087559

ALL INKED IN FILL IN THIS SECTION

Name (Last, First)

~~ST~~

Stemme, Michael

Date

07.28.2022

Module and Cell Number

ECHO 026

Admission Date

05.25.2022

I would like to see Capt. Nottingham

I need to see that staff person because i, Michael Stemme, am a witness to "nurse Leann" DENYING inmate FALCEY, JPS medication on 07/20/2022 and on 07/21/2022 AT EVENING medication car 11+ time of arrival.

Michael Stemme

Signature of Inmate

Do Not Write Below This Line Michael Stemme

Data request answered:

Answer:

Referral Sent To:

Return To:

Module & Cell #

Signature of Staff Person

BCCF 194 REV. 10/04

CC: File (M)

CC: File (RE)

Pg.5

2022-64pg5

037454

ALL INFORMATION FILL IN THIS SECTION

Name (Last, First)

MORGAL Gary

Date

7-28-22

Module and Cell Number

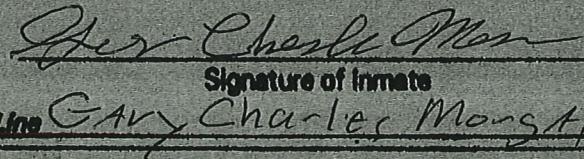
E-34

Admission Date

7-29-22

I would like to see CAPTian Nottingham

I need to see that staff person because I, Gary Morgal, Am A witness to
a Nurse (Leanne) Denying inmate Falcor Jr's
medication on 07/20/22 and on 07/21/22 At
Evening med. cart time of arrival.


Signature of Inmate

Do Not Write Below This Line

Date request answered:

Answer:

Referred Sent To:

Return To:

Module & Cell #

Signature of Staff Person

BCCF 194 REV. 10/04

CC-File(ALL)

CC-File(BE)

Pg. 6

2022-64 pg 6

095896

ALL INMATES FILL IN THIS SECTION

Name (Last, First)

Kerrigan, James

Date

07/28/22

Module and Cell Number

E - 20

Admission Date

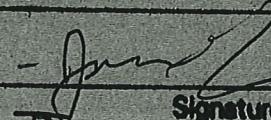
06/24/22

I would like to see

Capt. Nottingham

I need to see that staff person because

I, James Kerrigan, am a witness to "nurse Leeanne" DENYING Inmate Falcey, Iris medication on 07/21/2022 after evening med-cart time of arrival.



Signature of Inmate

Do Not Write Below This Line

JAMES KERRIGAN

Date request answered:

Answer:

Referral Sent To:

Return To:

Module & Cell #

Signature of Staff Person

*Exhibit I

~~CC: FILED~~ BUCKS COUNTY DEPARTMENT OF CORRECTIONS
INMATE GRIEVANCE FORM

Pg.1

DATE July 28, 2022

NAME Patrick Falvey, Jr. BCCF# 105188 FACILITY Bucks County Prison CELL E-20
GRIEVANCE # 2022-64, DATE POSTED: 8/3/22, INITIALED P

It is understood that all information pertaining to this grievance shall be released to the Bucks County Prison Oversight Board.

ATTACH ADDITIONAL PAGES AS NEEDED

*Deliberately indifferent acts of bad faith and retaliation.

Statement detailing the act or condition giving rise to this grievance. (Be specific, list all dates, times, locations and witnesses. Handwritten grievance must be legible, if not it will be returned.) Good morning attorney

I, Patrick Falvey, Jr., a United States Citizen, Amiable Individual, and Vol. Good Samaritan in the Community now, in great pain and distress, NEEDS to inform you (while never meaning to be a pest, but nevertheless,) of an IMMEDIATE attention required FORMAL COMPLAINT. On July 20, 2022 at evening meal cart time of arrival, I approached the Med cart to be given my medication and I respectfully stated to the nurse "Leeanne"! "I respectfully refuse the Trazodone, but not the Advil" and she replied: "No, you are refusing it all." And I replied back: "No I am NOT! I NEED my Advil to alleviate the unbearable pain I am in from an injury I sustained here on 06/26/2022." She then replied back saying: "I said no, You are refusing all of it! Get away from my med cart! There by DENYING me my Advil, I then returned to my housing (Par 2)

Statement detailing informal process which you have attempted in order to resolve this grievance: (Attach any written documentation from staff.)

I had Sgt. Moreni HAND DELIVER the above privately, confidentially, and DIRECTLY to "PA. Molly" on 07/08/2022. I also requested Derek Davis do the SAME except to Dr. Gessner 4-5 days ago, no response. Deliberate Disregard from most Med. Staff.

Specific remedy being sought:

- 1) All my medication refilled, 2) A response to my prior properly submitted grievance (Dated 07/07/2022), And, 3) Record provided to me that "nurse (Leeanne)" is held accountable.

Received by:

Date:

First Level Response:

After review with the Prime Care Medical supervisor, it was noted that you were seen by the Physician's Assistant on 8/8/22 and Tylenol was added back to your medications. You are also scheduled to see the Doctor on 8/10/22 to evaluate any other medical concerns you may still have. Therefore this grievance is denied.

Answered by: Camp

Date: 8/10/2022

Appeal to Director of Corrections: If the inmate/resident is not satisfied with the outcome of the first level response, he/she may then forward a written appeal, with the previous response, to the Director. The appeal must be filed within ten (10) days of the inmate's receipt of the first level response. After a review, the Director will make resolution in writing within ten (10) days of receiving the appeal. (Appeal form on back).

Appeal to the Bucks County Prison Oversight Board: If the inmate/resident is not satisfied with the outcome of the appeal to the Director, he/she may forward a written appeal with the previous responses, within ten (10) days of receipt of the Director's response, to the Bucks County Prison Oversight Board, attn: Controller's Office, 55 E. Court Street, Doylestown, PA, 18901. The County Prison Oversight Board shall provide the Director of Corrections with a copy of any such appeal and will forward its written decision to the inmate/resident and the Director of Corrections.

~~CC: FILED~~

Exhibit I 1

BUCKS COUNTY DEPARTMENT OF CORRECTIONS
INMATE GRIEVANCE FORM

Pg.2

DATE July 28

NAME JAMES Patrick Falco, Jr. BCCF# 105188 FACILITY ^{Bucks} Bucks County Prison CELL E-
GRIEVANCE # 2022-64 pg 2, DATE POSTED: 7/17/2022

Statement detailing the act or condition (Cont.): — my housing unit in even more UNBEARABLE PAIN and feeling GROSSLY DISCRIMINATED.

The very next day (July 21, 2022) same evening Med. cart of arrival, same nurse ("Leeann"), when I approached the med. cart, nurse Leeann stated in a VERY DETESTING AND HATEFUL MANNER: "You no longer have an order for Adv. Now get away from my med. cart!" AGAIN DENYING ME medication. I then, in disbelief, asked to promptly speak w/ Sgt. or Lt. and I was yelled at to return to my housing while some inmates then stated out loud: "that was cruel as unusual of her". (For the record, she has her last name COVERED with tape ^{on the} _{not} ^{Raymond} Raymon)

Then on Wed. July 27, 2022 at approx 1000 hours, I was called down to the dispensary lobby to be given my permanent 16 mg dose of Subutex Maintenance and it was nurse Lee dispensing the Subutex. When she went to inspect my mouth she DELIBERATELY stepped back and made an OUTRAGEOUS FALSE ACCUSATION/COMMENT stating: "you still have medication in your mouth". And I replied: "NO I do NOT! I NEED all of my medication! I NEVER even think of doing ANYTHING beside taking ALL of my medication." She then told me to "sit and wait" longer than the other inmates. I then stated: "Why are you so BIAS toward me?" (while showing her every possible which may to inspect my mouth) "all I do is thank you for what you said to do". She then replied: "you really got on my last nerve".

Lastly, on Thurs. (today) at approx. 0430 hours when my Subutex was dispensed to me, (After proudly being free and clear)

XG226

S:File(d)

C:File(BE)

*Exhibit I2

CC:File(ADM)
CC:File(RED)

BUCKS COUNTY DEPARTMENT OF CORRECTIONS
INMATE GRIEVANCE FORM

Pg 3

DATE July 28,

Bucks
County

Prison

NAME Patrick Falcey Jr. BCCF# 105188 FACILITY CELL
GRIEVANCE # 2022-64173, DATE POSTED INITIALED

Statement detailing the act or condition (Cont.): — and clear
of ANY and ALL opioids/ethanol for YFARS of being on my
PERMANENT 16 MG DAILY DOSE OF Sabutex, eve
the providing ^{covered} nurse then stated: "your dose 'mysterious'
DROPPED FROM 16 MG TO HALF OF THAT SINCE
YESTERDAY MORNING?" I then replied: "that's
impossible." He then replied: "I'll have to fix it when I
speak with Dr. Gessher."

Withall stated in this Grievance, PLEASE PROMPTLY
RECTIFY THE MATTER(S) AT ONCF. I am becoming
SICK AND IN EVEN MORE UNBEARABLE PAIN
(Witnesses listed [signed & dated] on pg. 4, 5, and 6 [ATTACHED])
(Verbal from "OFC. Nocta")

~~I still have NO RESPONSE to my properly submitted
DOC-226 (Inmate Grievance Form) dated 07/07/2024
that was allegedly "given to medical" [cc: File(ADM/RED)]
Shall I re-submit copies of / have copies of sent here to you~~

Most of all,

Thank you for Your Service in the
Field of Corrections!

Respectfully,



PATRICK FALCEY, JR.

DOC226
CC:File(ADM)
CC:File(RED)

LS Document 1 Filed 06/24/2023

~~cc: File (RE:)~~ **NOTIFICATION OF APPELLATE REVIEW BY DIRECTOR**

RE: (The first level response is a RECKLESS DISREGARD FOR THE TRUTH.)
Statement of rationale for appeal:

Statement of rationale for appellate review:

Statement of rationale for appellate review: Good morning/afternoon, the first level response, being vague on its face, is a SENSELESS AND DEFLECTING response, as this matter requires extensive and careful review of ALL documentation within this grievance. Since the act and condition, I suffered (and still am suffering) exacerbated chronic pain, mental and emotional distress, and extreme uneasiness due to being denied my recovery + chronic pain ^{sustaining + alleviating} ^{16 mg dosage of Shute} ^{Grant} maintenance over PROBABLY BIASED AND FALSE FORMULATED UNPROVEN OPINION(S), sought ^{Remedy} Received by: _____ Date: _____

Resolution:

No new evidence presented, therefore grievance is denied.

Answered by:

Date: October 4, 2022

NOTIFICATION OF APPELLATE REVIEW BY BUCKS COUNTY PRISON OVERSIGHT BOARD

Statement of rationale for review by Prison Oversight Board:

Plan of Rationale for Review by Prison Oversight Board:

Per all above stated within the Statement of Rationale for Appellate Review, and the fact that new evidence was presented, grant sought remedy including \$15,000 monetary compensation.

Received by:

Date:

Resolution by Prison Oversight Board:

(CC: File (CRE))PrimeCare Medical, Inc.— SICK CALL REQUEST / PETICIÓN DE ENFERMERIA —NAME / NOMBRE Patrick Falvey, Jr. DATE / FECHA 08/11/2022

PATIENT NUMBER / NÚMERO DE IDENTIFICACIÓN DEL PACIENTE

DATE OF BIRTH / FECHA DE NACIMIENTO 05/24/1991(UNIT / CELL) / (UNIDAD / CELULA) E-20B

(TO BE COMPLETED BY PATIENT) / (PARA SER COMPLETADA POR PACIENTE)

REASON FOR REQUEST / RAZÓN DE LA SOLICITUD Good morning/afternoon,
I am in UNBEARABLE PAIN from an injury I sustained
here on 06/26/2022, and I am EXTREMELY DIS-
COMFORT including my recovery being greatly
affected due to BIASED AND FALSELY
ACCUSING HEARSAY by RN Leeanne Christopher ^{Christopher} & Nochleet, HSA(Sign below) / (TO BE COMPLETED BY MEDICAL STAFF) /
It's Policy! / (PARA SER COMPLETADO POR EL PERSONAL)

DATE RECEIVED IN MEDICAL:

8/14/22

RESPONSE:

SameEl

(SIGNATURE)

(DATE)

(CC: File (AU))

BCCF-194

PrimeCare Medical, Inc.

— SICK CALL REQUEST / PETICIÓN DE ENFERMERIA —

NAME / NOMBRE Patrick Falvey, Jr. DATE / FECHA 08/07/2022

PATIENT NUMBER / NÚMERO DE IDENTIFICACIÓN DEL PACIENTE

DATE OF BIRTH / FECHA DE NACIMIENTO 05/24/1991(UNIT / CELL) / (UNIDAD / CELULA) (E-20 B)

(TO BE COMPLETED BY PATIENT) / (PARA SER COMPLETADA POR PACIENTE)
 *Request to Promptly see DOCTOR * RAZÓN DE LA SOLICITUD Good morning/afternoon

I am in UNBEARABLE PAIN from an Injury I sustained here on June 26, 2022, and I am in EXTREME DISCOMFORT including my recovery being affected due to BIASED AND FALSELY ACCUSING HEARSAY by RN "Leean" and Chris Norfleet, HSA.

(TO BE COMPLETED BY MEDICAL STAFF) /
 (PARA SER COMPLETADO POR EL PERSONAL)

DATE RECEIVED IN MEDICAL:

8-8

RESPONSE:

Notified

(SIGNATURE)

(DATE)

CC: File (AM)
CC: File (RE9th)

CC: File (AU)
CC: File (BE)

PrimeCare Medical, Inc.

— SICK CALL REQUEST / PETICIÓN DE ENFERMERIA —

NAME / NOMBRE Patrick Falvey, Jr. DATE / FECHA 08/03/2022

PATIENT NUMBER / NÚMERO DE IDENTIFICACIÓN DEL PACIENTE _____

DATE OF BIRTH / FECHA DE NACIMIENTO 05/24/1991

(UNIT / CELL) / (UNIDAD / CELULA) E-20

(TO BE COMPLETED BY PATIENT) / (PARA SER COMPLETADA POR PACIENTE)

REASON FOR REQUEST / RAZÓN DE LA SOLICITUD I am (and have been) in UNBEARABLE PAIN from an injury I sustained here on 06/26/2022, and I am becoming EXTREMELY UNCOMFORTABLE including my recovery being affected due to BIASED FALSE ACCUSATIONS. Please promptly call me to see Dr. Gessner.

(6th Sick Call) (TO BE COMPLETED BY MEDICAL STAFF) /
(PARA SER COMPLETADO POR EL PERSONAL)

DATE RECEIVED IN MEDICAL: 8-4

RESPONSE: _____

Spontaneously

(SIGNATURE)

(DATE)

CC: File (AU)

4/23/24, 7:07 AM

CorEMR - FALCEY, PATRICK MICHAEL - #2022002040 (05-24-1991) :: Full Patient History | v5.5.0

ef: 5172514 pg 72 of 100 for PATRICK FALCEY JR

	Jenei from the DA's office, and several Norristown State Hospital staff First 30 days, cooperative, no medication, making progress and regular family visit, making progress toward goals and comp			
09-10-2021 6:45 am	NSH MEETING HELD 9/9/21 via teams: Present for the meeting were this writer from PrimeCare, Christine Walsh from Adult Probation, Nicole Chambers and Kimberly Halpin from the PD's office, Ray McManamon, Reanna Serafine, Colin Jenei from the DA's office, and several Norristown State Hospital staff. Recently deemed competent, spoke with PD Suzette Adler today 9/9	Heron, Jessica	All Staff	Mental Health Note
09-15-2021 11:48 am	Patient COVID-19 vaccine record not located in PA-SIIS.	Thomas, RN, DON, Jessica	Medical Staff	Misc. Note
06-02-2022 9:34 pm	Mr Falcey refused to come to dispensary for check. Visualized pt jumping up oob when guard knocked on door window with key.	Thiers, Lorraine	All Staff	Medical Note
06-04-2022 6:00 am	per block officer pt reported chest pain prior to subutex admission. This writer checked on pt. and once subutex was admitted pt said "my chest does not hurt, I just had anxiety and wanted my subutex".	Panasenko, RN, Inna	Medical Staff	Medical Note
06-04-2022 2:04 pm	seen cell side- pt ambulated to cell door nad noted pt says hes good- has never refuses to come down its all lies the guards	Erisman, LPN, Paula	Medical Staff	Medical Note
06-07-2022 2:13 pm	not seen for detox check this am d/t medical emergency in dispensary, pt visualized cell side, has no emergent complaints, will be assessed second shift	Hill, LPN AHSA, Kristin	Medical Staff	Misc. Note
06-27-2022 6:39 pm	pt brought down to dispensary saying he couldnt breathe. Color good, lungs clear to auscultation, pulse ox 99%. Patrick decided he had back pain instead and asked for ibuprofen which he was given200mg po. He left, saying he felt better.	Thiers, Lorraine	All Staff	Medical Note
07-04-2022 6:43 am	PT HAD A COTTON BALL IN HIS LEFT TOOTH AREA, THIS WRITE NOTICED THE COTTON BALL AS SUBS WERE BEING POURED, PT WAS MOVING HIS MOUTH VIGOROUSLY, CO PATTERSON TOLD THE PT TO STOP BUT HE CONTINUED WHEN THIS WRITER CAME UP TO PT AND ASKED TO OPEN HIS MOUTH HE WOULD NOT AND PURPOSELY TIRED TO ACT LIKE HE WAS CONFUSED BUT STILL MOVING HIS MOUTH AND TONGUE, 2 ADDITIONAL OFFICERS APPROACHED THEN THE PT OPENED HIS MOUTH AT WHICH THE COTTON BALL WAS GONE. HE DID NOT COMPLY WITH INSTRUCTIONS AND KEPT MOVING HIS TONGUE IN ALL DIRECTIONS.	Panasenko, RN, Inna	Medical Staff	Medical Note
07-27-2022 11:04 am	Pt was in dispensary for subs, when subs where under the pt's tongue he was nmoving his mouth around vigourously. Pt stated " he was done", checked pt's mouth he had pushed the subs into the side of his mouth. When doing mouth check, white powder was noticable on right side of the cheek, and around the gum line. CO noticed the white substance in the pt's mouth when he did a mouth check, also. Pt denied they subs where there. Had pt sit in dispensary for 10 more mins, and rinsed his mouth with 2 cups of water. Rechecked mouth all subs were dissolved. Pt was sent back to the block.	Reynolds, Lee Ann	Medical Staff	Medical Note
07-27-2022 11:37 am	Pursuant to diversion attempt 07/27=bup dosage reduced to 8mg	Gessner, MD, Victoria	Medical Staff	Medical Note
07-31-2022 12:21 am	Contacted CVS for medication verification; States inmate has not picked up medication since April. States was on generic form of Suboxone and was given 30 day supply. Inmate has filled no other medications at CVS.	Oke, Makeda	Medical Staff	Medical Note
08-15-2022 11:56 am	Pt seen on block and provided information on how to request his records from primecare corp offices follow up as needed, see scanned documents	Vosper (BH), Kimberly	All Staff	Mental Health Note
08-23-2022 7:25 am	pt placed Level 2 med this am, SCS received from pt that he is " in UNBEARABLE pain and DISCOMFORT" d/t his recovery attempts and medicals biased towards him. no clinical indication for medication changes at this time.	Hill, LPN AHSA, Kristin	Medical Staff	Medical Note
08-23-2022 9:17 am	MH TX Plan: CMHS recommends he follow up with Northeast Community Center for Behavioral Health located at Roosevelt Blvd. & Adams Ave., Philadelphia, PA 19124. They have walk in hours so he will need to call them upon release and find out what time he can come in. The number is (215) 831-2800. MHI completed and email date and time of completion to records dept. follow up as needed, email sent to necessary parties	Vosper (BH), Kimberly	All Staff	Mental Health Note
08-29-2022 12:04 pm	***Records sent from corporate office*** PCM Corp Record Request-Please see attached for your records. Thank you, Alessandra Granke Medical Records Clerk Primecare Medical, Inc. 3940 Locust Lane Harrisburg, PA 17109 717- 545-5787 ext.1117 (phone) 717-364-1329(fax)	Jensen, AA, Lisa	All Staff	Misc. Note
10-18-2022	Pt was found to have over 200 Tylenol and ibuprofen pills in his cell by security 10/17/225. Almost 2000mg of Seroquel was also found- MH advised. Pt placed on Lvl 1 CMHS for medication hoarding of a level that could cause death or serious harm. A bottle containing spit was also found in his cell. This spit has tested +	Norfleet, RN, Christopher	Medical Staff	Medical Note

It is understood that all information pertaining to this grievance shall be released to the Bucks County Prison Oversight Board.

ATTACH ADDITIONAL PAGES AS NEEDED

* Exhibit L

Deliberately and different acts of retaliation

Statement detailing the act or condition giving rise to this grievance: (Be specific, list all dates, times, locations and witnesses. Handwritten grievance must be legible, if not it will be returned.) Good morning afternoon,
I, Patrick Falvey, Jr., a United States Citizen, Amiable Individual, and
Vol. Good Samaritan in the Community that is on an unreasonable
and seemingly indefinite Lv. 2 Medical lock status now, while
never meaning to be a pest, but nevertheless NEEDS to inform you
of an immediate attention required FORMAL COMPLAINT:

On 08/23/2022, I was placed on a Lv. 2 Medical lock status
for NO APPARENT REASON, as part of certain (Christopher Northcutt,
HSA and RN LeeAnn Reynolds) Medical Staff's chain of retaliation
towards me for my (respectful) grieving of their gross violations
of my rights as a human being and as an inmate on 06/26/2022
and 07/28/2022, also on 08/08/2022 as I was walking toward
the exit of the dispensary lobby, I overheard one of the staff (

Statement detailing informal process which you have attempted in order to resolve this grievance: (Attach any written documentation from staff.)

Request to: 1) Jessica of C.M.H.S., 8/24/22, no response. 2) Ms. Longecker of
Business Office, 8/24/22, no response. 3.) Robyn S. Jones (Admin Secretary) of
Warden's Office, 8/24/22, no response. 4.) Case Manager Supervisor
Mr. Lekich, 8/26/22, responded (Attached). 5.) C.M. Preo, no response.

Specific remedy being sought:

1.) A composed admission of fault and apology statement by the R.N. and
P.A. for UNREASONABLY placing me on a Lv. 2 med. lock status, and,
2.) The approx. \$40.00 TAKEN from my inmate account for the Sick Call (1913-11)
Requests that I was NEVER even seen for to be promptly RETURNED at once.

Date:

Received by:

First Level Response:

After further review with the Prime Care Medical supervisor, you were placed on Level 2 medical for closer observation due to you submitting multiple sick call slips claiming you were experiencing agonizing pain. These measures were taken to determine if there were any underlying issues that may be causing the pain. Therefore, this grievance is denied.

Date: 9-20-2022

out loud: "I'll find out what prosecutor has your case and make sure you never go home." Per the Inmate Handbook "those on watch status are reviewed on a regular basis by the treatment department(s). I have been reviewed NOT EVEN ONCE since placed on said lock watch status and beside I, being in and having unbearable (NOT "deteriorating") [chronic] pain in my lower and middle back (that was made substantially WORSE from an injury I sustained here on 06/26/2022), there is NO medical issue for me to be on a "Lv.2 Med. lock watch status." That is to say, "if one is in unbearable pain from a [chronic] [REDACTED] should injury, or from a tooth ache, shall they then be placed on a Lv.2 Med. lock watch status?" Let alone for an on recon [chronic] pain matter. BY the Medical Staff's DELIBERATE AND DISCRIMINATING VOID OF ALL IMPARTIALITY was I, for no apparent reason other than for a BIASING RETALIATION placed on a Lv. Med. lock watch status. Lastly, there has been approx \$40.00 TAKEN from my Inmate Account for Sick Call [9113-AU] Requests that I have NOT been advised of that I was NEVER even seen for. Per the Inmate Handbook: "...you will be advised if there will be a co-payment deducted from your inmate account." (see Attached pg. 5), and: "there will be no co-pay charged for... chronic care;" (see Attached pg. 5).

[End of Report] *Exhibit L1

Most of all, Thank You for Your Service in the field of Correction

Exhibit L2CC: FILE (AC)
CC: FILE (RE)

NOTIFICATION OF APPELLATE REVIEW BY DIRECTOR

Statement of rationale for appellate review: Good morning/afternoon, per the inadequate, deflecting, and unjustifiable first level Response, the stated approx. \$40.00 TAKEN from my Inmate Account for Sick Call requests that I was NEVER even seen for, was left COMPLETELY UNADDRESSED. Secondly, there was NO "determination" made for the EXACERBATED chronic pain in my lower and middle back due to the injury I sustained here on June 26, 2022, because during the "measure taken" of UNREASONABLY placing me on a 1/1, 2 Med. lock watch status for 8(eight) days, I was NOT reviewed on a regular basis; in fact, I was reviewed NOT EVEN ONCE. Grant sought remedy.
 Received by: _____ Date: _____

Resolution:

No new evidence presented, therefore grievance is denied.

Answered by: _____

Date: October 11, 2022

 Appeal - NOTIFICATION OF APPELLATE REVIEW BY BUCKS COUNTY PRISON OVERSIGHT BOARD
 to Robert Harvie, Jr., Chairman of BCP Oversight Board by CERTIFIED MAIL
 Statement of rationale for review by Prison Oversight Board: - in November of 2022 at 55 East Court Street, Doylestown, PA 18901 (No Response to date).

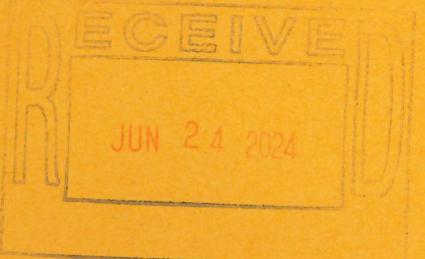
Per all the above stated within the Statement of Rationale for Appellate Review, and the fact that new evidence has been presented, grants sought remedy, including reasonable monetary compensation (between \$8,000 and \$12,000).

Received by: _____

Date: _____

Resolution by Prison Oversight Board:

Patrick M. Falvey, Jr.
SCI - Chester
500 E. Fourth St.
Chester, PA 19013



U.S. MAIL
S.M.S.

United States District Court
601 Market St. Philadelphia, PA
19106

LEGAL
===== MAIL
cc: (RE)

(#1)

1